

January 17, 2025

**Via ECF**

The Honorable Jennifer L. Rochon  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: The Roman Catholic Diocese of Rockville Centre, New York v. Evanston Insurance Company, Case No. 21-cv-9304 (JLR) (SLC)**

Dear Judge Rochon:

Please accept this joint status update from The Roman Catholic Diocese of Rockville Centre, New York (the "Diocese"), Evanston Insurance Company, as successor by merger to Associated International Insurance Company ("Evanston"), and the DRVC Abuse Claim Trust (the "Trust") in response to the Court's November 18, 2024 Order (ECF No. 77).

On November 19, 2024, the Bankruptcy Court entered an order,<sup>1</sup> which among other things, approved the settlement agreements, release and buybacks with certain insurers and other parties. On December 4, 2024, the Bankruptcy Court entered an order<sup>2</sup> confirming the *Modified Chapter 11 Plan of Reorganization Proposed by The Roman Catholic Diocese of Rockville Centre, New York and Additional Debtors*, (as amended, the "Plan"),<sup>3</sup> which became effective December 5, 2024.

The parties continue to actively work to achieve certain conditions precedent to settlement payment outlined in the settlement agreements that were approved on November 19, 2024. Accordingly, the parties jointly request that the stay be continued until March 10, 2025. If the parties have not dismissed this action by that date, the parties request a further opportunity to update the court with regard to the status of their settlement and anticipated dismissal of this action.

This letter has been reviewed and approved by counsel for all parties.

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<sup>1</sup> *In Re: Diocese of Rockville Centre*, No. 21-CV-00071, Dkt. 3414.

<sup>2</sup> *Id.* at Dkt. 3465.

<sup>3</sup> *Id.* at Dkt. 3447.

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Very truly yours,

*/s/ Timothy Law*  
Timothy Law  
Reed Smith LLP  
*On behalf of the Diocese of*  
*Rockville Centre*

*/s/ Jillian G. Dennehy*  
Jillian G. Dennehy  
Kennedys CMK LLP  
*On behalf of Evanston*  
*Insurance Company*

*/s/ Jesse J. Bair*  
Jesse J. Bair  
Burns Bair LLP  
*On behalf of the DRVC*  
*Abuse Claims Trust*